

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION  
3:22-MD-03036-KDB**

**IN RE: GARDASIL PRODUCTS LIABILITY  
LITIGATION**

**MDL No. 3036**

**THIS DOCUMENT RELATES TO  
ALL BELLWETHER CASES**

**APPENDIX OF MATERIALS IN SUPPORT OF MERCK'S  
MOTION TO EXCLUDE TESTIMONY AND OPINIONS  
OF PLAINTIFFS' EXPERT MARTIN KULLDORFF, PH.D.**

In support of their Memorandum in Support of Motion to Exclude Testimony and Opinions of Plaintiffs' Expert Martin Kulldorff, Ph.D., Defendants Merck & Co., Inc. and Merck Sharp & Dohme LLC submit the following evidentiary materials:

<b>TAB</b>	<b>DESCRIPTION</b>
1	Yih W, et al. A Broad Safety Assessment of the 9-Valent Human Papillomavirus Vaccine. <i>American Journal of Epidemiology</i> . 2021;190(7):1253-1259
2	October 25, 2024 Deposition Transcript of Martin Kulldorff, Ph.D.
3	Kulldorff Expert Report (Sept. 9, 2024).
4	Gee J, et al. Monitoring the safety of quadrivalent human papillomavirus vaccine: Findings from the Vaccine Safety Datalink. <i>Vaccine</i> . 2011(29):8279-8284
5	Yih K, et al. Assessment of Quadrivalent Human Papillomavirus Vaccine Safety Using the Self-Controlled Tree-Temporal Scan Statistic Signal-Detection Method in the Sentinel System. <i>American Journal of Epidemiology</i> . 2018;187(6):1269-1276
6	European Medicines Agency, Assessment Report on Human Papillomavirus (HPV) Vaccines (November 11, 2015), available at <a href="https://www.ema.europa.eu/en/documents/referral/hpv-vaccines-article-20-procedure-assessment-report_en.pdf">https://www.ema.europa.eu/en/documents/referral/hpv-vaccines-article-20-procedure-assessment-report_en.pdf</a> .

7	European Medicines Agency (“EMA”), Glossary of Regulatory Terms – Safety Signal, available at <a href="https://www.ema.europa.eu/en/glossary-terms/safety-signal">https://www.ema.europa.eu/en/glossary-terms/safety-signal</a>
8	FDA, Potential Signals of Serious Risks (Dec. 30, 2024), <a href="https://www.fda.gov/drugs/fdas-adverse-event-reporting-system-faers/potential-signals-serious-risksnew-safety-information-identified-fda-adverse-event-reporting-system">https://www.fda.gov/drugs/fdas-adverse-event-reporting-system-faers/potential-signals-serious-risksnew-safety-information-identified-fda-adverse-event-reporting-system</a> (last visited January 4, 2025)
9	October 18, 2024 Deposition Transcript of Lucija Tomljenovic, Ph.D.

DATED: January 6, 2025

Respectfully submitted,

/s/ Allyson M. Julien

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